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Sent: 1/12/2021 1:29:57 AM
To: Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) [derek.j.robinson1@navy.mil]
CC: Praskins, Wayne [Praskins.Wayne@epa.gov]; tina.low@waterboards.ca.gov; Bacey, Juanita@DTSC [Juanita.Bacey@dtsc.ca.gov]
Subject: RE: new slides for 2021 presentations on Parcel G
Attachments: Parcel G Slides_Mar 2020_DraftV1_ys2_wp.pdf

Derek,
Thank you for providing these draft slides.

We concur with Nina's suggestion on Slide 1 and her question on how the Navy will discuss the secondary evaluation on Slide 2. Additionally, Wayne and I do have a number of comments on the document itself (attached). I've highlighted the key ones below. It might be useful to talk through them, so let us know if you want to connect over the phone.

Either way, we would appreciate seeing a revised version.

Slide 1

- **Title** – The title seems unnecessarily long, plus not entirely accurate (comments below). Please consider: "Establishing Radiological Background Levels for Soil"
- **Bullet** – EPA does not agree with that statement: "Background samples established remedial goals (RGs)..." RGs are established in the ROD or in post-ROD change documentation. RGs were not established by the Navy's background sampling efforts. Consider language already developed in the Navy's July 2020 fact sheet: "Background sampling helped establish soil background levels which may be used for radiological retesting." Please provide revised language.
- **Bullet** – EPA does not agree with that statement: "Off-site location soil samples used for Parcel G RGs." This statement suggests that background sampling established RGs for the site, which is not true. Consider language similar to the Navy's July 2020 fact sheet: "Data from the off-site location will be used as the primary background sampling area." Please provide revised language.

Slide 2

- **Collect New Data** - Uranium-235, Cobalt-60 and Plutonium-239 are radionuclides of concern for some soils and/or buildings for the Parcel G retesting efforts. There is space to include them. Please provide a reason not to include sampling results for these three radionuclides.
- **Evaluate Data** – Add "Compare to background levels" or consider using language from the Navy's July 2020 fact sheet?

Slide 4

- **Strontium Chart** - Include a footnote on the Strontium chart that indicates the "background" range shown is the range of detection limits (i.e., not measured background). Even a simple change to the legend: Background (may be lower than shown). Please provide revised language.
- Uranium-235, Cobalt-60 and Plutonium-239 are also radionuclides reviewed for the Parcel G retesting efforts. Again, is there a reason not to include sampling results for these three radionuclides, too?

Also, I encourage the Navy to have the July 2020 background explained fact sheet available as an easy-to-find handout for the open house.

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Be safe. Stay in place. Maintain your space. Cover your face (when interacting).

From: Bacey, Juanita@DTSC <Juanita.Bacey@dtsc.ca.gov>
Sent: Tuesday, December 29, 2020 4:35 PM
To: Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1@navy.mil>
Cc: Praskins, Wayne <Praskins.Wayne@epa.gov>; tina.low@waterboards.ca.gov; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>
Subject: RE: new slides for 2021 presentations on Parcel G

Hi Derek,

I have looked at the slide presentation. Given that there will be an explanation of the slides provided, I have no specific slide comments. That said, not knowing what additional details you will provide in your presentation, I'd like to offer some suggestions.

- Slide 1 - describes background soil sampling. Given that the community was very concern about the collection of background soil samples from HPNS, I hope that you will explain how and why those sites were selected, even though, in the end, you decided not to use them.
- Slide 2 – will you be discussing the secondary evaluation if a soil sample is above the RG?

Thx.

Nina

From: Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA) <derek.j.robinson1@navy.mil>
Sent: Tuesday, December 22, 2020 9:48 AM
To: Praskins, Wayne <Praskins.Wayne@epa.gov>; Bacey, Juanita@DTSC <Juanita.Bacey@dtsc.ca.gov>; Low, Tina@Waterboards <Tina.Low@waterboards.ca.gov>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>
Subject: new slides for 2021 presentations on Parcel G

Please see the attached draft slides for your review/comment by January 30.

These slides are for the Navy's March meeting, but may be used in other meetings.

Data will also be updated through the end of January or early February.

Derek